

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

JOAO BOCK TRANSACTION SYSTEMS,  
LLC,

Plaintiff,

v.

JACK HENRY & ASSOCIATES, INC.,  
Defendant.

Case No. 1:12-cv-01138-SLR

**Judge SUE L. ROBINSON**

**PLAINTIFF'S ANSWERS TO DEFENDANT'S FIRST AMENDED COUNTERCLAIMS**

Plaintiff Joao Bock Transactions Systems, LLC ("JBTS") files this Answer to Defendant Jack Henry & Associates, Inc.'s ("Defendant" or "Jack Henry") First Amended Counterclaims (hereinafter "the Counterclaims") as filed on June 13, 2013 (Dkt. No.32) in response to JBTS's Original Complaint for Patent Infringement of U.S. Patent No. 7,096,003 (the "'003 Patent"):

27. Paragraph 27 of the Counterclaims contains no allegations and, therefore, requires no response.

**THE PARTIES**

28. Upon information and belief, JBTS admits to the allegations set forth in paragraph 28 of the Counterclaims.

29. JBTS admits to the allegations set forth in paragraph 29 of the Counterclaims.

### **JURISDICTION**

30. JBTS admits to the allegations set forth in paragraph 30 of the Counterclaims, but denies that Defendant is entitled to the relief it seeks.

31. JBTS admits there is a justiciable controversy between JBTS and Defendant concerning Defendant's liability for infringement of the '003 Patent. JBTS denies the remaining allegations set forth in paragraph 31 of the Counterclaims.

32. JBTS admits that venue is proper in this judicial district for Defendant's Counterclaims but denies the remaining allegations set forth in paragraph 32 of the Counterclaims.

33. JBTS denies the allegations set forth in paragraph 33 of the Counterclaims.

34. JBTS denies the allegations set forth in paragraph 34 of the Counterclaims.

35. JBTS denies the allegations set forth in paragraph 35 of the Counterclaims.

36. JBTS denies the allegations set forth in paragraph 36 of the Counterclaims.

37. JBTS denies the allegations set forth in paragraph 37 of the Counterclaims.

### **DEFENDANT'S PRAYER FOR RELIEF**

JBTS denies that Defendant is entitled to the relief requested in its Answer, Affirmative Defenses, Counterclaims or any other relief.

### **JBTS'S AFFIRMATIVE DEFENSES**

#### **FIRST AFFIRMATIVE DEFENSE**

Each cause of action set forth in Defendant's Counterclaims fails to state a claim upon which relief can be granted.

**SECOND AFFIRMATIVE DEFENSE**

Defendant's Counterclaims are barred, in whole or in part, by the equitable defenses of estoppel, waiver, laches and/or unclean hands.

**JURY DEMAND**

In accordance with Rule 38 of the Federal Rules of Civil Procedure, JBTS respectfully demands a jury trial of all issues triable to a jury in this action.

**JBTS'S PRAYER FOR RELIEF**

WHEREFORE, JBTS prays for judgment against Defendant as follows:

- A. For judgment dismissing Defendant's Counterclaims with prejudice;
- B. An award of the costs of this action;
- C. For a declaration that this is an exceptional case, and an award to JBTS of its attorneys' fees incurred herein; and
- D. That JBTS be awarded such other and further relief as the Court may deem just and proper, including all relief requested in JBTS's Original Complaint.

Date: June 27, 2013

**STAMOULIS & WEINBLATT LLC**

Respectfully submitted,

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***Attorneys for Plaintiff Joao Bock Transaction  
Systems, LLC***

**CERTIFICATE OF SERVICE**

I hereby certify that on June 27, 2013 I electronically filed the above document(s) with the Clerk of Court using CM/ECF which will send electronic notification of such filing(s) to all registered counsel.

s/ Stamatios Stamoulis  
Stamatios Stamoulis #4606